



Matthew Oppenheim
4530 Wisconsin Ave, NW, Suite 5
Washington, DC 20016
Tel. 202.450.3958
matt@oandzlaw.com

VIA CM/ECF AND EMAIL

June 11, 2024

The Honorable Martin Glenn
U.S. Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: *In re Frontier Communications Corp.*, Case No. 20-22476 (S.D.N.Y. Bankr.)

Dear Chief Judge Glenn:

On behalf of the Record Company Claimants (the "RCCs"), we write to follow up on the May 29, 2024 conference the Court held regarding the RCC's objections to Frontier Communications Corp.'s ("Frontier") privilege assertions. At that conference, the Court directed the RCCs to submit a letter informing the Court of whether the RCCs intend to file a formal motion regarding their objections to Frontier's privilege assertions and, if so, when they intend to file such a motion. May 29, 2024 Hr'g Tr. 57:24-58:10, 59:7-11. The Court also agreed it would be acceptable for the RCCs to wait to file any such motion until the parties have completed depositions. *Id.* at 58:16-59:6.

Pursuant to that direction from the Court, the RCCs intend to file their motion regarding Frontier's privilege assertions after the close of fact discovery, once depositions are complete. After the parties have completed depositions, the RCCs will confer with Frontier regarding a briefing schedule for their motion and will submit a proposed schedule to the Court.

Respectfully submitted,

/s/ Matthew J. Oppenheim

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